

From: [Alex Nelson](#)
To: ["Emily J. Joselson"](#); [Ian Carleton](#); [Zachary M. York](#); [Devin McKnight](#)
Cc: [Lisa B. Shelkrot](#); [Matt Pawa Esq.](#); [Wesley Kelman Esq.](#); [Kyle McGee Esq.](#); [Kenna Graziano](#); [Wendy E. Radcliff](#); [Hansen, Steve \(SHB\)](#); [Goutman, Tom \(SHB\)](#)
Subject: RE: Rubman et al v. Bayer AG et al, 2:22-cv-00181-wks Subpoena and PRA Request to BSD
Date: Wednesday, November 23, 2022 12:53:00 PM

Emily and Matt,

Per our conversation yesterday, below is a subcategory of document requests from Defendants' Schedule A.

- 1–5, 7–17, 22–24, 32–33, 35–37, 42–45, 48–52, 54–55, 61–62, 64–65, and 67

The subcategory seeks all documentation Defendants' experts will need to inspect and test the high school, including all documents regarding (a) construction/design; (b) renovations; (c) significant maintenance; (d) testing; and (e) plaintiffs' working locations and conditions. As you will see, Defendants have reduced their requests from 67 to 40 and many of the document requests involve the same narrow subject matters.

Please let us know whether there is any additional information we can provide before our call on 11/30.

Thanks,

Alex

Alexandrea L. Nelson
SHEEHEY FURLONG & BEHM P.C.

30 Main Street, 6th Floor
PO Box 66
Burlington, VT 05402-0066
(802) 864-9891 (voice)
(802) 865-6373 (direct)
(802) 502-8003 (cell)
(802) 864-6815 (fax)

Pronouns: she, her, hers

anelson@sheeheyvt.com

CONFIDENTIALITY NOTICE: This email is intended only for the use of the recipient(s) named above and may be subject to the attorney-client and/or work product privileges, neither of which is waived by this transmission. If you received this email in error, please immediately notify the sender by reply email or phone (802-864-9891) and destroy this communication. Thank you.

From: Emily J. Joselson <EJoselson@langrock.com>

Sent: Monday, November 21, 2022 11:15 AM

To: Ian Carleton <icarleton@sheeheyvt.com>; Alex Nelson <Anelson@sheeheyvt.com>; Zachary M. York <zyork@sheeheyvt.com>; Devin McKnight <DMcKnight@sheeheyvt.com>

Cc: Lisa B. Shelkrot <LShelkrot@langrock.com>; Matt Pawa Esq. <mpawa@seegerweiss.com>; Wesley Kelman Esq. <wkelman@seegerweiss.com>; Kyle McGee Esq. <kmcgee@gelaw.com>; Kenna Graziano <MGraziano@seegerweiss.com>; Wendy E. Radcliff <WRadcliff@langrock.com>

EXHIBIT D

Subject: Re: Rubman et al v. Bayer AG et al, 2:22-cv-00181-wks Subpoena and PRA Request to BSD

Hi Ian and your team:

How about tomorrow, Tuesday, at 10?

Best,

Emily Joselson

Sent from my iPhone

On Nov 19, 2022, at 8:04 AM, Ian Carleton <icarleton@sheeheyvt.com> wrote:

Emily, Lisa,

Per my brief conversation with Emily last Monday, we'd like to schedule at least a preliminary call on Monday or Tuesday of next week to talk about these document requests in terms of what we need in order to prepare our experts to conduct the necessary inspections prior to demolition.

My schedule is wide open both days. What works best for either/both of you?

Enjoy the weekend,

Ian P. Carleton
SHEEHEY FURLONG & BEHM P.C.
30 Main Street, 6th Floor
PO Box 66
Burlington, VT 05402-0066
(802) 734-0609 (Mobile)
(802) 864-9891 (Office Main)
(802) 865-6321 (Office Direct)
icarleton@sheeheyvt.com
www.sheeheyvt.com

CONFIDENTIALITY NOTICE: This email is intended only for the use of the recipient(s) named above and may be subject to the attorney-client and/or work product privileges, neither of which is waived by this transmission. If you receive this email in error, please immediately notify the sender by reply email or phone (802) 864-9891 and destroy this communication. Thank you.

From: Alex Nelson <Anelson@sheeheyvt.com>

Sent: Friday, November 18, 2022 3:46 PM

To: Lisa B. Shelkrot <LShelkrot@langrock.com>; ejoselson@langrock.com

Cc: Ian Carleton <icarleton@sheeheyvt.com>; Devin McKnight

<DMcKnight@sheeheyvt.com>; Zachary M. York <zyork@sheeheyvt.com>

Subject: Rubman et al v. Bayer AG et al, 2:22-cv-00181-wks Subpoena and PRA Request

to BSD

Hi Emily and Lisa,

Please see the attached correspondence in the above captioned matter.

Best,

Alex

Alexandrea L. Nelson
SHEEHEY FURLONG & BEHM P.C.

30 Main Street, 6th Floor
PO Box 66
Burlington, VT 05402-0066
(802) 864-9891 (voice)
(802) 865-6373 (direct)
(802) 502-8003 (cell)
(802) 864-6815 (fax)

Pronouns: she, her, hers

anelson@sheeheyvt.com

CONFIDENTIALITY NOTICE: This email is intended only for the use of the recipient(s) named above and may be subject to the attorney-client and/or work product privileges, neither of which is waived by this transmission. If you received this email in error, please immediately notify the sender by reply email or phone (802-864-9891) and destroy this communication. Thank you.

This e-mail may contain privileged and confidential information, and is intended solely for the use of those to whom it is addressed. If you are not an intended recipient, please delete this message, destroy all copies, and notify us as soon as possible. If you are the intended recipient, please note that email is not a secure method of communication, and you may choose to communicate with us by other means.

WARNING: EXTERNAL E-MAIL.